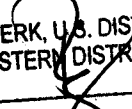


**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

FILED

MAR 28 2016

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

EVA MARISOL DUNCAN,

Plaintiff,

v.

Case No. SA-14-CA-00912-FB

JPMORGAN CHASE BANK, N.

§ Defendant.

OBJECTION OF DONALD GORS, PRO SE

NOW COMES, Objectors Donald Gors, PRO SE hereby files these objections to the proposed settlement in this matter.

PROOF OF MEMBERSHIP IN CLASS

Upon information and belief Donald Gors, Pro Se (herein referred to as "Objector") has reviewed the notice and believes that he is a member of the class as defined in that certain Notice of Class Action and Proposed Settlement which is not dated (herein referred to as the "Notice"). These representations are made under the penalty of perjury. Objector intends to file a Claim in this matter on or before midnight March 23, 2016. (Claim deadline according to the Notice). Objector's address, e-mail addresses and telephone numbers are listed at the conclusion of this objection.

NOTICE OF INTENT TO APPEAR

Objector hereby gives notice that he does **NOT** intend to appear at the Fairness Hearing presently scheduled for April 27, 2016 at 9:30 a.m. CST before Honorable John H. Wood at the United States Courthouse Building, 655 E. Cesar E. Chavez Blvd. San Antonio, Texas 78206.

REASONS FOR OBJECTING TO THE SETTLEMENT

For the following reasons, inter alia, the Settlement Agreement is not fair, reasonable nor adequate:

1. The fee calculation is unfair in that the percentage of the settlement amount is far too high (it is stated in the Notice that it is 33.33%). The Objector hereby states that, of the 33 docket entries on PACER, very few entries were substantive in nature. In fact, only the Plaintiff's Complaint, Defendant's Answer, Plaintiff's Motion for Preliminary Approval of Settlement and Final Motion to Approve the Settlement and Award Attorney's Fees had any significant legal substance in its content (although the Motion to Approve Attorney's Fees did appear to have significant legal substance). The remaining entries were mostly procedural in nature. This is hardly the

type of case justifying Plaintiff's Attorneys' Fees in the amount of \$2,913,000.00.

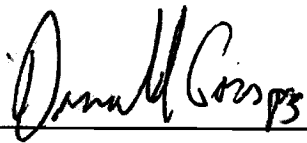
2. It is also notable that the Settlement was reached in principal in approximately 9 months and 15 days following the commencement of this action. Furthermore, Class Counsel's Memorandum of Law in Support of the Motion for Attorney's Fees appears to be a catalogue of cases whereby other lawyers were successful in obtaining excessive fee awards and not a compelling recitation of why the fees and costs are appropriate in this specific case.
3. The fee request is not reasonable in the absence of documentation, including detailed billing records (including hourly rates of the professionals, hours accumulated and reasonable costs incurred), which can be evaluated by Class Members and the Court to determine the reasonable nature (or not) of the fee request. Attorneys' fees are disproportionate to the value of the Recovery of the Class.
4. The Objector herein hereby adopts and joins in all other objections which are based on sufficient precedent and theories of equity and law in this case and hereby incorporates said objections by reference as if they were fully described herein.

CONCLUSION

WHEREFORE, This Objector, for the foregoing reasons, respectfully requests that the Court, upon proper hearing:

1. Sustain these Objections;
2. Enter such Orders as are necessary and just to adjudicate these Objections and to alleviate the inherent unfairness, inadequacies and unreasonableness of the proposed settlement.
3. Award an incentive fee to this Objector for their role in improving the Settlement, if applicable.

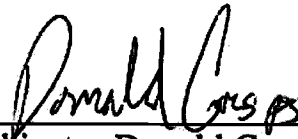
Respectfully submitted by:



Donald Gors

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 23, 22, 2016, I caused to be filed the foregoing with the all counsel listed in Notice via email and further mailed to the Clerk of the Court of the United States District Court for the Western District of Texas by sending this document via U.S. First Class Mail Delivery.

A handwritten signature in black ink, appearing to read "Donald Gors", is positioned above a horizontal line.

Objector Donald Gors, Pro Se
c/o Pamela Sachtjen
2590 Richardson Street
Madison, WI 53711
310-339-0548
eb5venturesllc@gmail.com

CERTIFICATE OF SERVICE

I certify that on March 23, 2016, I mailed a copy of the foregoing via first class OR HIGHER mail to the following addresses as required by the court settlement agreement:

Clerk of the Court
U.S. District Court for the
Western District of Texas
655 E. Cesar E. Chavez Blvd.
San Antonio, Texas 78206

Benjamin R. Bingham, Esq.
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New York, New York 10007